

Assessment of compliance with the Code of Practice for Official Statistics

Statistics from the English Housing Survey

*(produced by the Department for
Communities and Local Government)*

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About the UK Statistics Authority

The UK Statistics Authority is an independent body operating at arm's length from government as a non-ministerial department, directly accountable to Parliament. It was established on 1 April 2008 by the *Statistics and Registration Service Act 2007*.

The Authority's overall objective is to promote and safeguard the production and publication of official statistics that serve the public good. It is also required to promote and safeguard the quality and comprehensiveness of official statistics, and good practice in relation to official statistics.

The Statistics Authority has two main functions:

1. oversight of the Office for National Statistics (ONS) – the executive office of the Authority;
2. independent scrutiny (monitoring and assessment) of all official statistics produced in the UK.

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ASSESSMENT AND DESIGNATION

The *Statistics and Registration Service Act 2007* gives the UK Statistics Authority a statutory power to assess sets of statistics against the *Code of Practice for Official Statistics*.

Assessment will determine whether it is appropriate for the statistics to be designated as National Statistics.

Designation as National Statistics means that the statistics comply with the *Code of Practice*. The *Code* is wide-ranging. Designation can be interpreted to mean that the statistics: meet identified user needs; are produced, managed and disseminated to high standards; and are explained well.

Designation as National Statistics should not be interpreted to mean that the statistics are always correct. For example, whilst the *Code* requires statistics to be produced to a level of accuracy that meets users' needs, it also recognises that errors can occur – in which case it requires them to be corrected and publicised.

Assessment Reports will not normally comment further on a set of statistics, for example on their validity as social or economic measures. However, Reports may point to such questions if the Authority believes that further research would be desirable.

Assessment Reports typically provide an overview of any noteworthy features of the methods used to produce the statistics, and will highlight substantial concerns about quality. Assessment Reports also describe aspects of the ways in which the producer addresses the 'sound methods and assured quality' principle of the *Code*, but do not themselves constitute a review of the methods used to produce the statistics. However the *Code* requires producers to "seek to achieve continuous improvement in statistical processes by, for example, undertaking regular reviews".

The Authority may grant designation on condition that the producer body takes steps, within a stated timeframe, to fully meet the *Code's* requirements. This is to avoid public confusion and does not reduce the obligation to comply with the *Code*.

The Authority grants designation on the basis of three main sources of information:

- i. factual evidence and assurances by senior statisticians in the producer body;
- ii. the views of users who we contact, or who contact us, and;
- iii. our own review activity.

Should further information come to light subsequently which changes the Authority's analysis, it may withdraw the Assessment Report and revise it as necessary.

It is a statutory requirement on the producer body to ensure that it continues to produce the set of statistics designated as National Statistics in compliance with the *Code of Practice*.

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1 Summary of findings

1.1 Introduction

1.1.1 This is one of a series of reports¹ prepared under the provisions of the *Statistics and Registration Service Act 2007*². The report covers:

- *English Housing Survey: Headline report;*
- *English Housing Survey: Annual household report; and*
- *English Housing Survey: Annual housing stock report*

produced by the Department for Communities and Local Government (CLG)³. These reports contain statistics on people's housing circumstances and the condition and energy efficiency of housing in England. The English House Condition Survey (EHCS) was integrated with the Survey of English Housing (SEH) in April 2008 to create the English Housing Survey (EHS). CLG published the *Headline Report* in February 2010; this presented the first results of the new survey. CLG has told the Assessment Team that it plans to publish the two Annual reports in autumn 2010.

1.1.2 This report was prepared by the Authority's Assessment team, and approved by the Board of the Statistics Authority on the advice of the Head of Assessment.

1.2 Decision concerning designation as National Statistics

1.2.1 The Statistics Authority judges that the statistics covered by this report are readily accessible, produced according to sound methods and managed impartially and objectively in the public interest, subject to the caveats in this report. The Statistics Authority confirms that the statistics detailed in paragraph 1.1.1 are designated as National Statistics, subject to CLG implementing the enhancements listed in section 1.5 and reporting them to the Authority: Requirement 5 by October 2010 and Requirements 1 to 4 and 6 to 8 by April 2011.

1.3 Summary of strengths and weaknesses

1.3.1 The statistics from the EHS meet the main user needs and CLG's statisticians consulted users about the recent changes to survey methods. The integration of the two previous housing surveys into the EHS has resulted in cost reductions for CLG.

1.3.2 CLG has introduced the use of digital pens in the physical survey element of the EHS which has resulted in improvements in speed of data entry and data quality at relatively low cost.

¹ <http://www.statisticsauthority.gov.uk/assessment/assessment-reports/index.html>

² http://www.opsi.gov.uk/Acts/acts2007/pdf/ukpga_20070018_en.pdf

³ <http://www.communities.gov.uk/housing/housingresearch/housingsurveys/englishhousingurvey/ehspublications>

1.3.3 The proposed commentary and explanatory material in the two Annual reports could be strengthened to help users to interpret the data and their quality appropriately.

1.4 Detailed recommendations

1.4.1 The Assessment team identified some areas where it felt that CLG could strengthen its compliance with the Code. Those which the Assessment team considers essential to enable designation as National Statistics are listed in section 1.5. Other suggestions, which would improve the statistics and the service provided to users but which are not formally required for their designation, are listed at annex 1.

1.5 Requirements for designation as National Statistics

- Requirement 1** Take steps to develop a more complete understanding of the use made of the statistics; publish the relevant information and assumptions and use them to better support the use of the statistics (para 3.4).
- Requirement 2** For future releases, announce changes to methods in advance of any publications (para 3.6).
- Requirement 3** Inform users about the quality of the statistics presented in published reports (para 3.10).
- Requirement 4** Work with the devolved administrations to identify a subset of comparable data and explain the reasons for the lack of comparability where appropriate (para 3.12).
- Requirement 5** Adopt systematic statistical planning arrangements (para 3.24).
- Requirement 6** Ensure that the EHS *Annual household report* and the *Annual housing stock report* are published with commentary, analysis and supporting information that meets user needs and is at least of equal standard to the previous SEH *Housing in England* reports and the EHCS reports (para 3.26).
- Requirement 7** Revise the publication timetable so that the Annual Reports are released in a more timely manner (para 3.30).
- Requirement 8** Publish the name and contact details of the responsible statistician in future *Headline Report* publications (para 3.32).

2 Subject of the assessment

2.1 The English Housing Survey (EHS) is annual survey of households and their housing. The survey sample is selected to ensure statistically representative coverage of England. The EHS comprises an interview with households at the selected addresses and a follow-up property inspection and market valuation of a sub sample of these properties where a full household interview has been achieved. There is a target of 17,000 full household interviews and a target of 8,000 follow-up physical surveys. The EHS, launched in April 2008, brings together two former CLG surveys – the English House Condition Survey (EHCS) and the Survey of English Housing (SEH). The EHS has integrated the household interviews of the SEH and the EHCS whereas the property inspections, carried out as part of the EHCS, has remained largely unchanged in the new survey design.

2.2 The EHS has a complex multi-stage methodology and is made up of three main elements:

The EHS interview

The interview is the household survey element and covers the main topics previously included in the EHCS and the SEH. These include household composition, housing history, buying aspirations of renters, tenancy deposits, second homes, work done to the home, housing costs and a detailed income module. The interview survey now forms part of the Office for National Statistics' (ONS) Integrated Household Survey (IHS)⁴.

The physical survey

The physical survey is conducted by qualified surveyors who undertake an internal and external inspection of the home to record the type, age and construction type of the property. They assess the property's state of repair, heating system, energy efficiency characteristics and health and safety risks.

The market valuation

This component is a desk-based exercise - qualified valuers assess the property's market value based on property descriptors and photographs collected during the physical survey.

2.3 CLG contracts out the survey fieldwork to ONS and ONS' partner surveying company, Miller Mitchell Burley Lane (MMBL). ONS has overall responsibility and runs the interview and market value survey fieldwork. MMBL recruits and manages the qualified surveyors who conduct the property inspections. A third contract is with the Building Research Establishment (BRE) which provides expert input to stock assessment and complex data modelling to derive analytical measures, such as fuel poverty and health and safety indicators. BRE is also responsible for training the surveyors.

2.4 In October 2005 CLG undertook a cost benefit analysis looking at hardware and software options for carrying out the physical survey, including the use of laptops, palm tops and pen pads. This concluded that the digital pens looked

⁴ <http://www.statistics.gov.uk/cci/nugget.asp?id=936>

the most promising alternative, and these were introduced in 2008/09. This new procedure has eliminated the need for the manual inputting of the data from the paper forms. It has also improved quality and reduced the need for additional acceptance testing and validation by ONS personnel, since surveyors validate their own forms through computer prompted checks. Surveyors are able to address some of the data inconsistencies and missing data at this stage.

- 2.5 The EHS informs CLG decisions on policy relating to energy efficiency, vulnerable people in non-decent homes⁵, children in poor housing, and satisfaction with home and landlords. It also underpins the Department for Energy and Climate Change (DECC) Fuel Poverty strategy and is widely used within CLG and across government particularly in relation to climate change, poverty and inequality issues. The survey is also a major and well used data set for the wider housing community.

⁵ Non-decent homes refer to those that do not meet the four stated requirements set out in *A Decent Home: Definition and Guidance for implementation*.
<http://www.communities.gov.uk/publications/housing/decenthome>

3 Assessment findings

Principle 1: Meeting user needs

The production, management and dissemination of official statistics should meet the requirements of informed decision-making by government, public services, business, researchers and the public.

- 3.1 CLG runs an advisory group which includes members from government departments, the UK Data Archive, National Housing Federation, Joseph Rowntree Foundation, Shelter and members of the academic community. The group meets twice a year to discuss the development of the survey. Minutes and papers⁶ of the group are available on CLG's website. Users who responded to the consultation carried out as part of this Assessment made positive comments about the usefulness of the group.
- 3.2 CLG has a published *User engagement strategy*⁷. As part of this strategy, CLG publishes an *EHS Bulletin*⁸, which is a newsletter designed to keep all users up to date with survey publications, consultations and any wider survey development and progress.
- 3.3 Users can ask to be added to the electronic mailing list for the *Bulletin*; contact details are available on CLG's website. The first edition of the *Bulletin* was published in February 2010 and CLG plans to produce it on a regular basis. The current *Bulletin* is not clearly accessible from the EHS pages of CLG's website. The Assessment team suggests that CLG make the *Bulletin* available on the EHS News and Bulletins page of its website.
- 3.4 CLG statisticians are aware of the uses of EHS statistics across government departments but have less detailed knowledge of wider uses. Users from outside government are directed to BRE for bespoke analysis and to the UK Data Archive for the full dataset. CLG does not have a formal process for recording the types of uses made of the statistics for those users who contact BRE and the UK Data Archive directly. As part of the designation as National Statistics, CLG should take steps to develop a more complete understanding of the use made of the statistics; publish the relevant information and assumptions and use them to better support the use of the statistics⁹ (Requirement 1).
- 3.5 CLG carried out a consultation on its proposed dissemination strategy in December 2009. The Dissemination strategy¹⁰ was made available to users via CLG's website in July 2010 and through the Housing Statistics Network¹¹. The dissemination strategy was published in July 2010 and a summary of users' responses¹² is available on CLG's website.

⁶ <http://www.communities.gov.uk/publications/housing/ehsadvisorygroup>

⁷ <http://www.communities.gov.uk/publications/housing/ehsuserengagement?view=Standard>

⁸ <http://www.communities.gov.uk/publications/corporate/statistics/ehsbulletin1>

⁹ In relation to Principle 1, Practice 2 of the Code of Practice.

¹⁰ <http://www.communities.gov.uk/publications/housing/ehsdisseminationstrategy>

¹¹ <http://www.housingstatisticsnetwork.co.uk/>

¹² <http://www.communities.gov.uk/publications/housing/ehssummayresponse>

Principle 2: Impartiality and objectivity

Official statistics, and information about statistical processes, should be managed impartially and objectively.

- 3.6 The *Headline Report*, published in February 2010, includes a Technical annex which outlines the changes in sampling methodology between the EHS and its predecessors - the EHCS and the SEH. It also provides some information about the impact of the methodological changes. CLG plans to publish a detailed explanation of changes when the Annual Report is released, currently scheduled for October this year. As part of the designation as National Statistics, for future releases, CLG should announce changes to methods in advance of any publications for future releases¹³ (Requirement 2).
- 3.7 These statistics have a Revisions Policy¹⁴ which is consistent with the organisational Revisions Policy. The Assessment team has been assured that CLG statisticians are clear about the procedure to follow in the event of an error, and that this would include alerting stakeholders promptly.

¹³ In relation to Principle 2, Practice 4 of the Code of Practice.

¹⁴ <http://www.communities.gov.uk/housing/housingresearch/housingsurveys/englishhousingsurvey/ehsusers/ehsrevisionspolicy/>

Principle 3: Integrity

At all stages in the production, management and dissemination of official statistics, the public interest should prevail over organisational, political or personal interests.

- 3.8 No incidents of political pressures, abuses of trust or complaints relating to professional integrity, quality or standards were reported to or identified by the Assessment team.

Principle 4: Sound methods and assured quality

Statistical methods should be consistent with scientific principles and internationally recognised best practices, and be fully documented. Quality should be monitored and assured taking account of internationally agreed practices.

- 3.9 The methodology for the EHS has been developed from that used for the EHCS and the SEH. These methods have been developed over many years and follow best practice in terms of sampling, data collection, and weighting. Some details of the methods adopted are published in the Technical annex to the 2008-09 EHS *Headline Report* and CLG plans to publish a full technical report after the two Annual Reports are published. The Assessment team suggests that CLG investigate the options for publishing the technical report at the same time as the *Headline Report* in future.
- 3.10 CLG does not publish estimates of the main sources of bias and other errors or information about other aspects of quality. As part of the designation as National Statistics, CLG should inform users about the quality of the statistics presented in published reports.¹⁵ (Requirement 3).
- 3.11 CLG has introduced digital pen technology and an on-line validation system to the property survey element of the EHS. These changes enable surveyors to check and revise their data on a property before sending them to BRE: the result has been significant improvements to the speed and quality of data collection.
- 3.12 CLG meets with colleagues in Wales, Scotland and Northern Ireland, twice a year, to exchange information about survey methods and content and to discuss issues, particularly in relation to the measurement of fuel poverty. No European regulations exist regarding these statistics, although CLG has provided guidance to Eurostat regarding the running of a housing stock survey. Although similar surveys are carried out in Wales, Scotland, and Northern Ireland, these are not all on a consistent basis and UK-wide comparisons are not available; neither is documentation about the reasons for this lack of comparability. As part of the designation as National Statistics, CLG should work with the devolved administrations to identify a subset of comparable data and explain the reasons for the lack of comparability where appropriate¹⁶ (Requirement 4).
- 3.13 CLG has assured the Assessment team that maintaining continuity between the EHS and the two former surveys has been a priority in the development of the EHS. CLG is carrying out detailed work to look at any discontinuities that may have arisen as a result of the survey merger. The Assessment team suggests that CLG publish the results of this work at the earliest opportunity.

¹⁵ In relation to Principle 4, Practice 2 of the Code of Practice.

¹⁶ In relation to Principle 4, Practice 6 of the Code of Practice.

Principle 5: Confidentiality

Private information about individual persons (including bodies corporate) compiled in the production of official statistics is confidential, and should be used for statistical purposes only.

- 3.14 Anonymised data are deposited at the UK Data Archive in accordance with the EHS data security strategy. CLG follows the UK Data Archive data security strategy and the data are checked for any potentially disclosive information prior to release.
- 3.15 Only two named individuals who work on the production team have access to the encrypted address file, which is stored and transferred separately from the datasets.
- 3.16 CLG has a written confidentiality protection agreement with ONS which includes a clear commitment to keeping the data secure. External contracts also include this commitment.

Principle 6: Proportionate burden

The cost burden on data suppliers should not be excessive and should be assessed relative to the benefits arising from the use of the statistics.

- 3.17 Current running costs for the EHS are £6 million per year. CLG has informed the Assessment team that it has plans to reduce running costs to around £4.5 million by 2011/12. CLG expects to consult users concerning the details of the cost review shortly.
- 3.18 Merging the two former surveys into the EHS has delivered cost savings of around £500,000 per year.
- 3.19 CLG has assured us that it aims to keep the household interview to 40-45 minutes. The physical survey takes about one hour but this does not require any active involvement from the respondent, apart from providing access to the property.
- 3.20 The survey is the only nationally consistent set of information on household circumstances and the energy efficiency and condition of the stock. We were told that there is little scope for making use of alternative data sources to obtain the information. However, CLG is currently exploring the potential for obtaining energy consumption data by carrying out a data linkage exercise with an existing administrative data source.
- 3.21 CLG relies heavily on data modelling and estimation techniques to derive a number of key measures for analysis including energy efficiency ratings, costs of repairs and health and safety indicators. This reduces the length and complexity of the data collection process and ensures that measures are derived using consistent methods and sets of assumptions.

Principle 7: Resources

The resources made available for statistical activities should be sufficient to meet the requirements of this Code and should be used efficiently and effectively.

- 3.22 A full user consultation about plans to drop questions was carried out prior to the merger of the EHCS and the SEH. There was general acceptance, with only a few requests for the retention of questions that had been proposed for deletion.
- 3.23 CLG has recently reviewed the survey to identify where savings could be made in the running costs. CLG statisticians told us that they have developed a package of cost reduction measures with the aim of minimising the impact on end users in terms of the quality and range of data available to them, while reducing running costs by around 25% in 2011/12. This has been developed in collaboration with the ONS Methodology Consultancy Service. CLG will consult users about any proposed changes to the survey.
- 3.24 The planning of statistical activities in CLG is currently decentralised to business areas. The absence of co-ordinated statistical planning arrangements limits the extent to which the views of the potential wider user-base are taken into account. As part of the designation as National Statistics, CLG should adopt systematic statistical planning arrangements as the basis for consultation with users¹⁷ (Requirement 5). This could be achieved through the preparation of, and consultation about, a department-wide plan of statistical activities.
- 3.25 CLG has invested in the introduction of digital pens for data collection for the physical survey from 2008/09. This has resulted in annual cost savings and the initial set up costs are expected to be recouped within 3 years.

¹⁷ In relation to Principle 7, Practices 2 and 3 of the Code of Practice and previously specified in Assessment Report 32.

Principle 8: Frankness and accessibility

Official statistics, accompanied by full and frank commentary, should be readily accessible to all users.

- 3.26 The 2008-09 EHS *Headline Report* includes tables and clear commentary to aid the interpretation of the statistics. CLG told the Assessment team that the *Annual household report* will have a similar format to the previous SEH *Housing in England*¹⁸ reports and that the *Annual housing stock report* will have a similar format to the EHCS¹⁹ reports. These previous reports present the results effectively with sufficient explanation of the statistics and terminology. As part of the designation as National Statistics, CLG should ensure that the EHS *Annual household report* and the *Annual housing stock report* are published with commentary, analysis and supporting information that meets user needs and is at least of equal standard to the previous SEH *Housing in England* reports and the EHCS reports²⁰ (Requirement 6).
- 3.27 CLG told the Assessment team that the EHS technical reports, which CLG plans to publish shortly after the two Annual reports, will contain detailed information about methods for users.
- 3.28 Users who require the full dataset are directed to the UK Data Archive. Some users who responded to the CLG consultation on the dissemination strategy commented that they would prefer to access the data from the department on a CD, rather than via the UK Data Archive. We suggest that CLG investigate the options for providing the EHS data on a CD or other suitable format.

¹⁸<http://www.communities.gov.uk/housing/housingresearch/housingsurveys/surveyofenglishhousing/sehpublications/>

¹⁹<http://www.communities.gov.uk/housing/housingresearch/housingsurveys/englishhousecondition/ehcsreports/>

²⁰ In relation to Principle 8 Practices 1 and 2, and Principle 2 Practice 2 of the Code of Practice

Protocol 1: User engagement

Effective user engagement is fundamental both to trust in statistics and securing maximum public value. This Protocol draws together the relevant practices set out elsewhere in the Code and expands on the requirements in relation to consultation.

3.29 The requirements for this Protocol are covered elsewhere in this report.

Protocol 2: Release practices

Statistical reports should be released into the public domain in an orderly manner that promotes public confidence and gives equal access to all, subject to relevant legislation.

- 3.30 The EHS is a continuous survey and results are produced for each financial year. For the 2008-09 survey year, CLG received the quality assured data in November. The *Headline Report* was produced in February 2010, 11 months after the end of the data collection period. The main reports are due to be published in October, 19 months after the end of the data collection period. The Assessment team considers the period between the end of data collection and the publication of the Annual reports to be excessive. Some users also advocated this view through the user consultation exercise carried out by the Assessment team (see para A2.5). As part of the designation as National Statistics, CLG should revise the publication timetable so that the main reports are released in a more timely manner²¹ (Requirement 7). CLG may consider whether the content and format of the *Headline Report* and the Annual reports need to be amended, in order for their production to be more timely and hence to better meet user needs. This could include producing shorter topic reports on particular topics on an ad hoc basis.
- 3.31 EHS datasets are due to be available around the time that the Annual reports are published. We suggest data be made available at the same time as the *Headline Report* is published, by which time the data quality assurance processes should be complete.
- 3.32 CLG has assured the Assessment team that the main reports, due to be published in October 2010, will include the name and contact details of the responsible statistician. The *Headline Report* does not include these details. As part of the designation as National Statistics, CLG should publish the name and contact details of the responsible statistician in future publications²² (Requirement 8).

²¹ In relation to Protocol 2, Practice 1 of the Code of Practice.

²² In relation to Protocol 2, Practice 6 of the Code of Practice.

Protocol 3: The use of administrative sources for statistical purposes

Administrative sources should be fully exploited for statistical purposes, subject to adherence to appropriate safeguards.

- 3.33 CLG published its Statement of Administrative Sources²³ in February 2010. The statement is incomplete but the Assessment Team has been assured that the statement will be revised to include the missing items within the next six months.
- 3.34 The EHS is the only official source of statistics on household circumstances and the energy efficiency and condition of the housing stock in England. CLG is working with DECC on a pilot exercise to explore the potential for deriving estimates of energy consumption by linking EHS sample addresses to records provided by energy supply companies held by DECC. If successful this would provide a potentially cost-effective way of collecting additional information for use with the EHS data.

²³ <http://www.communities.gov.uk/publications/corporate/statementadministrativesources>

Annex 1: Suggestions for improvement

A1.1 This annex includes some suggestions for improvement to the English Housing Survey, produced by the Department for Communities and Local Government, in the interest of the public good. These are not formally required for designation, but the Assessment team considers that their implementation will improve public confidence in the production, management and dissemination of official statistics.

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|---------------------|--|
| Suggestion 1 | Make the <i>EHS Bulletin</i> available on the EHS News and Bulletins page of CLG's website (para 3.3). |
| Suggestion 2 | Investigate the options for publishing the technical report at the same time as the <i>Headline Report</i> (para 3.9). |
| Suggestion 3 | Publish the results of work to investigate discontinuities as a result of the survey merger at the earliest opportunity (para 3.13). |
| Suggestion 4 | Investigate the options for providing EHS data on a CD or other suitable format (para 3.28). |
| Suggestion 5 | Make data available at the same time as the <i>Headline Report</i> is published (para 3.31). |

Annex 2: Summary of assessment process and users' views

A2.1 This assessment was conducted from May to September 2010.

A2.2 The Assessment team – Catherine Barham and Emma Bowditch – agreed the scope of and timetable for this assessment with representatives of CLG in May 2010. The Written Evidence for Assessment was provided on 30 June. The Assessment team subsequently met CLG during July to review compliance with the Code, taking account of the written evidence provided and other relevant sources of evidence.

Summary of users contacted, and issues raised

A2.3 Part of the assessment process involves our consideration of the views of users. We approach some known and potential users of the set of statistics, and we invite comments via an open note on the Authority's website. This process is not a statistical survey, but it enables us to gain some insights about the extent to which the statistics meet users' needs and the extent to which users feel that the producers of those statistics engage with them. We are aware that responses from users may not be representative of wider views, and we take account of this in the way that we prepare assessment reports.

A2.4 The Assessment team received 16 responses from the user consultation. The respondents were grouped as follows:

Suppliers	4
Central government	9
Other	3

A2.5 Users generally found the statistics of good quality and the producers approachable and helpful. Some users mentioned the timeliness of the data and particularly the lag between the *Headline Report* and the Annual reports.

Key documents/links provided

Written Evidence for Assessment document

